

EXHIBIT "A"

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

FALAT et al.,

Plaintiff,

vs.

THE COUNTY OF HUNTERDON et al.,

Defendant.

Civil Action No.: 2:12-6804 (SRC-CLW)

PLAINTIFF'S RULE 26 DISCLOSURES

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Plaintiff Falat et al. ("Plaintiff") makes the following initial disclosures to the defendant, The County of Hunterdon et al. ("Defendant"). Plaintiff makes these disclosures based upon information currently known and/or reasonably available. Pursuant to Rule 26(e), Plaintiff reserves the right to supplement this Initial Disclosure Statement as additional information becomes available.

(A) Names and addresses of people likely to have discoverable information.

1. John Falat, Jr, Plaintiff
5451 Millema Lakes Blvd, #310
Orlando, FL 32839
2. Michael Russo, Plaintiff
250 Sitgreaves St.
Phillipsburg, NJ 08865
3. Deborah Trout, Plaintiff
907 Sergeantsville Rd.
Stockton, NJ 08559
4. Gaetano M. DeSapio, Defendant
1110 Harrison St., Suite H
Frenchtown, NJ 08825

5. Freeholder Board, Defendant
Hunterdon County
P.O. Box 2900
Flemington, NJ 08822
6. George Melick, Defendant
Hunterdon County
P.O. Box 2900
Flemington, NJ 08822
7. William Mennen, Defendant
Hunterdon County
P.O. Box 2900
Flemington, NJ 08822
8. Robert Walton, Defendant
Hunterdon County
P.O. Box 2900
Flemington, NJ 08822
9. Erik Peterson, Defendant
Hunterdon County
P.O. Box 2900
Flemington, NJ 08822
10. Matthew Holt, Defendant
Hunterdon County
P.O. Box 2900
Flemington, NJ 08822
11. Ron Sworen, Defendant
Hunterdon County
P.O. Box 2900
Flemington, NJ 08822
12. Cynthia Yard, Hunterdon County Administrator, Defendant
Hunterdon County
P.O. Box 2900
Flemington, NJ 08822
13. Kenneth Rowe, Hunterdon County Prosecutors Office, Defendant
Hunterdon County
P.O. Box 2900
Flemington, NJ 08822

14. Edward DeFillipis, Hunterdon County Prosecutors Office, Defendant
Hunterdon County
P.O. Box 2900
Flemington, NJ 08822
15. Donna Simon, Defendant
55 Bouwrey Place
Whitehouse Station, NJ 08889
16. Steven Lember, Esq.
160 Main St. Bldg B Suite 9
Flemington, NJ 08822
17. Katherine Errickson
105 No. Franklin St.
Lambertville, NJ
18. Denise Doolan, Clerk to Hunterdon County Freeholders
Hunterdon County
P.O. Box 2900
Flemington, NJ 08822
19. Cheryl Wieder, Human Resources Director Hunterdon County
Hunterdon County
P.O. Box 2900
Flemington, NJ 08822
20. Frank Bell, Hunterdon County Architect
Hunterdon County
P.O. Box 2900
Flemington, NJ 08822
21. George Wagner, Hunterdon County Public Safety Director
Hunterdon County
P.O. Box 2900
Flemington, NJ 08822
22. Margaret Pasqua, Treasurer Hunterdon County
Hunterdon County
P.O. Box 2900
Flemington, NJ 08822
23. Meghan Yowells, Finance Director
Hunterdon County
P.O. Box 2900
Flemington, NJ 08822

24. Kimberly Browne, Finance
Hunterdon County
P.O. Box 2900
Flemington, NJ 08822
25. Daniel Hurley, Hunterdon County Prosecutors Office
Hunterdon County
P.O. Box 2900
Flemington, NJ 08822
26. John Carbone, Esq. (COANJ Attorney)
Wilentz Law Firm
90 Woodbridge Center Drive, Ste. 900
Box 10
Woodbridge, NJ 07095-0958
27. Joseph Donahue, Esq.
70 Grand Ave, Suite 102
River Edge, NJ 07661
28. George Muller
1 Britton Rd.
Flemington, NJ 08822
29. John Maloney
Ewing Township
619 Westmoreland Drive
Trenton, NJ 08618
30. Fred Knapp, Morris Co. Prosecutor
10 Court St.
Morristown, NJ 07960
31. Catherine Elston, Esq.
3350 St. Rt. #138, Ste 121
Wall Twp, NJ 07719
32. Alton Kenny, Esq.
1593 Rt. 88 W
Brick, NJ 08724
33. Robert J. Hariri
341 Mendham Rd.
Bernardsville, NJ

34. Douglas King, DDS
35 East 38th St.
NY, NY 10016
35. Serena Dean
35 East 38th St.
NY, NY 10016
36. Andrew King
1163 Route 37 West, Suite A2
Toms River, NJ 08775
37. J. Patrick Barnes
Middlesex Co. Prosecutors Office
22 Kirkpatrick St.
New Brunswick, NJ 08901
38. William McGovern, Esq.
PO Box 634
West Windsor, NJ 08550
39. Thomas Mahoney, US Attorney's Office
970 Broad St. 7th Floor
Newark, NJ
40. Georgiana Falat
13548 Turtle Marsh Loop, #421
Orlando, FL 32837
41. Sharyn Falat
162 West 33rd St.
Bayonne, NJ 07002
42. Cheryl Falat
162 West 33rd St.
Bayonne, NJ 07002
43. Geraldine Czujak
13548 Turtle Marsh Loop, #421
Orlando, FL 32837
44. Gregory Ezekian
6 Pearl St.
Whitehouse Station, NJ 08889

45. Christine A. Hoffman, DAG
Department Of Law and Public Safety, Div. Of Criminal
5 Executive Campus, Suite 205
Cherry Hill, NJ 08002
46. Warren Cooper, Mayor
Frenchtown Municipal Building
31 2nd St.
Frenchtown, NJ
47. Henry Kuhl, Hunterdon County Republican Chairman
1 St. Route 12, #105
Flemington, NJ 08822
48. Michael Doherty, New Jersey Senator
127 Belvidere Ave., 2nd Floor
Washington, NJ 07882
49. Eugene Farkas, Trial Court Administrator
Hunterdon County
P.O. Box 2900
Flemington, NJ 08822
50. Honorable Neil Schuster
116 Village Blvd., Suite 307
Princeton, NJ 08540
51. Dermot O'Grady, DAG
Department of Law and Public Safety
P.O. Box 080
Trenton, NJ 08625
52. David J. Trout
907 Seargeantsville Rd.
Stockton, NJ 08559
53. Karen Bridge
1520 Central Ave.
Phillipsburg, NJ 08865
54. Mark Kobner
13 Woodside Lane
Flemington (Raritan Township), NJ

55. Douglas Steinhardt, Warren County Republican Chairman
235 Broubalow Way
Phillipsburg, NJ 08865
56. Elaine Trout
19 So. 5th Ave.
Manville, NJ 08835
57. Dale Parichuk
Myrtle Ave.
Washington, NJ
58. Lt. Steven Spears, Warren County Prosecutor's Office
413 2nd St.
Belvidere, NJ
59. Mark Bunting
Trenton (Mercer County), NJ
60. Louis Reiner
445 Rt. 12
Flemington (Raritan Township), NJ
61. Thomas Smith II
99 Leffler Hill Rd.
Flemington, NJ
62. Mary Melfi, Hunterdon County Clerk
Hunterdon County Clerk's Office
Flemington, NJ 08822
63. Susan Hoffman, Hunterdon County Surrogate
Hunterdon County Justice Center
Flemington, NJ 08822
64. Christopher Foley
7 Cindy Ct.
Lebanon, NJ
65. Anne Milgram, Attorney General
Department of Law and Public Safety
P.O. Box 080
Trenton, NJ 08625

66. Paula Dow, Attorney General
Department of Law and Public Safety
P.O. Box 080
Trenton, NJ 08625
67. Chris Christie, Governor
P.O. Box 001
Trenton, NJ 08625
68. Kim Guadagno, NJ Lt. Governor
Department of State
225 W. State St.
P.O. Box 300
Trenton, NJ 08625
69. Jeffrey Chiesa, Esq., Attorney General
R.J. Hughes Justice Complex
P.O. Box 112
Trenton, NJ 08625-0112
70. Steven Taylor, Director, Department of Law and Public Safety
R.J. Hughes Justice Complex
P.O. Box 112
Trenton, NJ 08625-0112
71. Frank Provenzano, Somerset County Sheriff
20 Grove St.
Somerville, NJ 08876
72. Edward Rochford, Morris County Sheriff
56 Washington St.
Morristown, NJ

(B) Relevant Documents.

Plaintiff is in possession of the following documents; The listed documents are located at the Law Offices of William J. Courtney at 200 Main Street, Flemington, NJ 08822. Documents will be available to view and/or copy by opposition at their expense and at a mutually agreeable time.

1. 4/25/08 Cynthia Yard denial of re-imbursement for Hunterdon County Bar Association
2. 5/9/08 Trout response to Yard's denial
3. 1/15/08 Yard memo, re: EZPass violation
4. 1/16/08 Yard memo, re: EZPass violation
5. 1/28/08 Edward Davis response to Yard's memo
6. 3/17/10 Yard memo, re: EZPass violation
7. 3/22/10 Trout response to Yard's memo
8. 3/24/10 Rhonda Kelly (Yard's secretary) response
9. 3/31/10 Trout response
10. 2/27/08 Capital Improvement Request memo (Davis to Peter Maddelena) and request form for security upgrades in Justice Center and courthouse
11. 4/28/08 Trout letter to E. Petersen, Director, Freeholder Board, Attorney ID Program
12. 6/10/08 Trout letter to D. Doolan, Clerk to Freeholder Board and all requests to discuss Motor Vehicle Commission contract
13. 7/18/08 Yard denial memo
14. 12/1/08 Maloney letter to Petersen, etc. explaining MVC request
15. 9/4/09 Trout letter to Mennen, Director, re: 2nd request from MVC
16. 10/2/09 Trout 2nd letter to Mennen, Director, re: 2nd request from MVC
17. 7/17/08 Yard email to Trout, re: Request #971 "Shirts"
18. 7/21/08 Trout letter to Yard, re: Re-request #971 "Shirts"
19. 9/10/08 Yard memo to Trout, re: Status of Requisitions
20. 9/29/08 Yard email to Trout, re: Friday 9/26/08 request
21. 9/29/08 Trout email response to Yard, re: 9/26/08 request to pay for requisitions
22. 11/18/08 Request #1041 – OC spray for Sheriff's Officers (received by purchasing 11/21/09 – sent to Yard 'for approval' 11/21)
23. 11/25/08 Yard request to provide evidence that personnel are certified to carry
24. 1/14/09 Trout response
25. 1/11/08 Trout memo to George Wagner, re: Voicemail
26. 7/22/08 Yard response "inadvertently misfiled"
27. 11/19/08 Email from DeSapio "Freeholders adopting resolution but not Muller employment"
28. 8/7/08 Yard memo "Budget Concerns" (Requisition Denials)
29. 10/27/08 Yard memo "Results of 10/21/08 Meeting"

30. 11/18/08 Request #1041 – Vests (11/21 record purchasing- 11/21 sent to yard for approval)
31. 12/10/08 Denial – “admin review” of Russo and Maloney
32. 3/20/09 Trout letter to DeSapio- Security Guard Liability
33. 3/24/09 Trout letter to DeSapio- Security Guard Liability
34. 4/24/09 Request #1103 – Badges and Badge cases (4/24 – sent from purchasing to Yard “for approval”)
35. 5/6/09 Yard denial
36. 5/15/09 Trout letter to Yard- 2nd req. of Req. # 1103
37. 7/20/09 Yard letter to Trout- denial
38. 7/28/09 Trout letter to D. Doolan, Clerk to Fr. Bd.- (request to be placed on 8/4 agenda)
39. 7/23/09 Req. # 1134- Court Officer Magazine
40. 7/23/09 Denied
41. 7/9/09 Expense Voucher #900496- Cleaning and Alterations of uniforms (recorded in Treasurer’s office 7/16/09)
42. 8/17/09 Yard memo- Voucher # 090496, uniform alterations denial
43. 12/1/09 Expense voucher #909619, 909621, 909624- training lunches
44. 12/8/09 Yard memo- denied
45. 12/1/09 Expense Voucher # 909620- NJ league of Municipalities Conference fee
46. 12/7/09 Yard memo-denied
47. 12/21/09 Yard memo to All Dept. managers- Distribution of Mennen paychecks in 2010
48. 1/4/10 Letter to Trout, etc. One less pay check in 2010
49. 1/6/10 Trout letter to Mennen-appointed to staff being held to terms of CWA contract and no raises (other unclassified received 3%)
50. 1/6/10 Yard memo to Trout- (salary statutorily prescribed and will remain same for 2010, but it did not)
51. 1/6/10 Yard memo to Debra VanHorn re. salary increase
52. 2/24/10 Trout memo to Mennen, Director, etc.- Modification to S/O appointees pay
53. 8/19/09 Yard email to Trout- denying “employee” to attend COANJ conference
54. 8/24/09 Trout response email
55. 7/2/09 Trout email to Mennen- Muller Conference attendance
56. 7/2/09 Mennen response
57. 10/16/09 Req. # 1179- CPM Class (Muller) (10.19.09 recorded by Purchasing and sent to yard for approval)
58. 10/26/09 Yard denial
59. 11/30/09 2nd request for payment from State of NJ
60. 1/8/10 3rd request for payment from State of NJ
61. 11/13/09 Expense Vouchers # 909334 and 909 336 –training lunches
62. 11/25/09 Yard denial memo
63. 12/30/09 Yard memo to Trout- re: Expense Vouchers resubmitted denied
64. 12/16/09 Maloney email to trout- training and payment
65. 12/22/09 Trout email to Yard- forwarded Maloney email and request
66. 12/22/09 Yard email to Trout
67. 1/15/10 Maloney email to Trout (cc yard) training schedule 1/18-2/7

68. 1/15/10 Yard response email to trout
69. 1/19/10 Trout response email to yard and DeSapio
70. 7/14/08 Russo memo to Allison Davis, Office of Child Support Services
71. 7/7/08 Yard memo to Trout ref. child support annual grant in Protocol
72. 7/22/08 Yard memo to Trout ref "Grant Protocol"
73. 6/23/09 Yard email to Muller and Trout- COPS grant
74. 6/23/09 Yard email to Muller and Trout- COPS grant
75. 6/29/09 Muller email to yard and Trout- COPS grant
76. 6/29/09 Yard email to Muller- COPS grant
77. 6/30/09 Muller response email to Yard- COPS grant
78. 10/8/10 Trout memo to D. Doolan- place on 10/19/10 agenda
79. 10/21/09 COPS Grant- Hunterdon County FB's Resolution
80. 6/26/09 COPS- Info email to Trout- Notice of Failure
81. 7/14/09 Trout letter to D. Doolan, Clerk of Bd.- placed on 7/21 agenda, ref. COPS grant
82. 1/5/10 Yard email to Trout. Ref COPS grant
83. 10/7/10 Yard memo to trout- (hold off on purchases) Purchases of video equipment
84. 10/13/10 Trout response letter to Yard
85. 12/8/08 "Confidential" Yard memo to Trout- Leave cards
86. 12/15/08 Trout response letter t Yard- "explain discrepancies"
87. 1/11/10 "Confidential" yard memo to Trout- Attendance Cards
88. 1/19/10 Trout response to both yard memos (2008 and 2010)
89. 7/23/08 Yard memo to Trout- "Investigative vehicle" 7/10/08 Complaint
90. 7/23/08 Yard memo to Trout- "Investigative vehicle" 7/19/08 Complaint
91. 7/28/08 Trout response memo to Yard
92. 7/24/08 Yard memo to Trout- Sherriff's vehicle Policy Violations
93. 10/14/08 Yard email to Trout- req. vehicle use complaint
94. 10/14/08 Trout response email
95. 10/14/08 Yard email response
96. 8/4/08 Trout email to yard- vehicles taken home
97. 8/4/08 Yard email to Trout- response
98. 8/5/08 Yard memo to Trout- Vehicle graphics req. #985
99. 8/29/08 Yard memo to Trout- Review Co. Polices and practices
100. 9/4/08 Trout response memo to Yard
101. 10/6/08 W. Cooper email "questionnaire" to trout, Russo and Maloney and Muller
102. 10/7/08 Maloney response to Cooper's questions
103. 10/9/08 Trout fax- memo to DeSapio/ news article from Democrat ("Sherriff Ignores policy")
104. 10/22/08 Trout memo to Fleet Management Committee and Director Peterson, S/O Liaison- S/O Vehicle Use policy
105. 11/13/08 Fleet Management Comm. (through Yard) memo to Trout
106. 8/28/09 Yard memo to Trout and others: re. Take Home Vehicles
107. 9/1/09 Trout letter to Yard- response
108. 9/9/09Yard email to Trout- Sherriff Incident on 8/20/09 with report by Yard of :incident"
109. 9/11/09 Trout response letter to Yard (cc: Mennen and Wagner)

110. 1/14/10 Yard email to Trout, re-vehicle
111. 1/19/10 Yard email to Trout, re-vehicle follow up inquiry
112. 1/19/10 Trout response email to Yard, cc: Wager and Mennen
113. 1/21/10 Walton email to Trout- Co. Car in Hampton
114. 1/22/10 Trout response email to Walton- co. Car in Hampton
115. 7/21/10 Req. # 1280- Seminars- Maloney (recorded by Purchasing and sent to Yard for approval 7/21/10)
116. 7/26/10 Yard denial
117. 7/27/10 Maloney letter to Yard- Seminar Attendance
118. 11/17/08 Yard memo to Trout- Intended Move of z Senior S/O's
119. 11/19/08 DeSapio email to Trout- Location of Employment Files
120. 11/21/08 Maloney repose email to DeSapio, req- both files and senior Sheriff's Officials
121. 2/11/08 "Confidential" Peterson letter to Trout, re: budget meeting
122. 3/5/08 Yard letter to Trout. Re: Unclassified Salaries (reg. Trout's 2/29/08 letter)
123. 1/22/10 Revised HS Policy 2005-03, Fringe Benefits
124. 8/15/08 Yard memo to Trout, re- response to 8/12/08 correspondence
125. 8/18/08 Trout letter to Yard- response
126. 12/11/09 Maloney memo to Trout, "Budget Expenditures"
127. 4/15/10 Trout letter to DeSapio – yard interference
128. 4/21/10 DeSapio letter to Trout – turned over to Free. 4/15 letter
129. 5/5/10 DeSapio letter to Trout – freeholders answer to 4/15 letter
130. 4/3/08 Melfi memo to Trout with copy of Title 22A, Chapter 370 – trust funds
131. 2/09 Mandatory 5-yr written spending plan for trust funds from John Carbone, Esq., to all COANJ members (7 pages)
132. 9/21/07 (Submitted) – Surrogate's Court. 5-yr plan (Hoffman)
133. 1/31/07 (Submitted) – Co. Clerk's 5-yr plan (Melfi)
134. 11/13/07 DeSapio memo to Freeholders, Co. Clerk, et al – "County Clerk's Trust Fund"
135. 3/09 Spending plan for trust funds by Jack Carbone
136. 3/17/09 Trout memo to Margaret Pasqua, Finance Director and W. Mennen, Freeholder Director "Completed 5-yr plan"
137. 6/3/09 Yard memo to Trout re 5-yr plan "Doesn't meet requirements"
138. 6/4/09 Trout response letter to Yard
139. 6/19/09 Trout letter to Mennen – need response to plan
140. 7/2/09 DeSapio letter to Mennen – answer to their request for review – Const. Officers Trust Fund with attachments
141. 7/10/09 Mennen memo to Trout, Melfi, Hoffman
142. 7/21/09 DeSapio email to Trout – Sheriff's revised trust fund
143. 7/22/09 Trout letter to Hon. Yolanda Ciccone – 5-yr trust fund plan w/ Maloney Certification
144. 7/8/09 Trout letter to Margaret Pasqua and W. Mennen 5-yr. plan
145. 7/29/09 Hon. Ciccone letter to Trout and DeSapio – mediation
146. 8/3/09 DeSapio letter to Trout – re: 5-yr plan mediation
147. 8/5/09 Trout email to DeSapio – 5-yr plan mediation mtg.
148. 8/5/09 M. Holt, freeholder email to Trout, Melfi, Hoffman, Peterson

149. 8/5/09 Trout response email to Holt to schedule mtg.
150. 12/11/09 Maloney letter to Trout, re: adequacy and use of 5-yr plan
151. 12/15/09 Maloney letter to Judge Schuster, re: mtg. results
152. 1/8/10 Maloney letter to Judge Schuster, re: mediation w/ Title 22A:2-51.1 and DeSapio 11/13/07 letter attached
153. 7/8/10 Maloney email to Judge Schuster, re: status of mediation
154. 7/8/10 Judge Schuster email to Maloney, re: status of mediation
155. 7/6/10 DeSapio letter to Judge Schuster – status of freeholders' evaluation of proposal
156. 7/13/10 Yard email to DeSapio, Trout and Bob Thurgarland, re: copiers
157. 7/13/10 DeSapio email to Yard, Trout and Bob Thurgarland, re: copiers
158. 7/14/10 B. Thurgarland email to DeSapio, cc: Trout, re: copiers
159. 3/17/09 Trout to M. Pasqua and Mennen – 5-yr. plan
160. 6/4/09 Trout letter to Yard, re: Yard 6/3/09 memo – 5-yr. plan
161. 6/30/09 (faxed date) DeSapio's "amended" 5-yr. plans for all C/Of.
162. 7/7/09 Melfi letter to Judge Ciccone, re: 5-yr. plan w/ attachments – Mary Melfi certification
 - a. 2/27/07 – freeholder minutes approval of 5-yr. plan
 - b. 3/17/09 – Freeholders resolution on membership conference
 - c. Melfi email to DeSapio 4/28/09
 - d. Melfi email to Mennen 5/6/09
 - e. Mennen email to Melfi 5/6/09
 - f. Melfi to DeSapio 5/12/09
 - g. Melfi to DeSapio 5/15/09
 - h. Melfi to DeSapio 5/20/09
 - i. 6/17/09 – Req. #1140 COANJ Conf.
163. 7/22/09 Melfi email to Maloney – re, revised 5-yr. plan
164. 7/22/09 Maloney email to Melfi – re, revised 5-yr plan
 - a. Attachment – revised plan, submitted 7/8/09
165. 7/28/09 DeSapio letter to D. Doolan – Co. Clerks Trust Fund
 - a. Attached – 7/24/09 Carbone letter to DeSapio – billing
166. 11/19/09 M. Holt email to Trout, cc: Mennen – Trust Fund discussion
167. 11/23/09 Maloney email to DeSapio, re: pre-mediation meeting
168. 3/4/10 John Carbone, Esq. letter to Tim Tyler, Burlington Co. Clerk, re: Trust Funds
169. 5/3/10 (5/5/10 – faxed) DeSapio "Statement of Position" to Judge Schuster, re: 5-yr plan (25 pages)
170. 5/6/10 Judge Schuster's mediation notes
171. 5/13/10 Judge Schuster's faxed letter to DeSapio and Trout and invoice, re: 5-year plan/trust fund
172. 8/9/10 Judge Schuster fax to Maloney – copy of
173. 8/5/10 DeSapio's letter to Schuster – Freeholder's Evaluation of Proposal
174. 8/11/10 Maloney email to Schuster, re – mediation
175. 9/2/10 Judge Schuster's fax to Maloney of –
176. 8/25/10 DeSapio letter to Schuster – trust fund dispute
177. 8/30/10 Maloney email to Schuster – Trust fund mediation
178. 9/1/10 Schuster email to Maloney
179. 9/2/10 Maloney email to Schuster

180. 10/13/10 Trout letter to Judge Ciccone – trust fund
181. 12/31/09 10/7/10 Sheriff's Trust Fund Balance Sheet
182. 5/15/96 Harcar memo to Doyle w/ Sup Ct decision attached in reference to Autonomy of Elected Officials (7/28/95)
183. 8/28/08 Email from Sheriff Leo McGuire – Opinion Freeholder's vs. Elected Officials
184. 12/18/08 Mennen letter to Trout – "Yard functions under the direction of Board"
185. 2008 Hunterdon County Sheriff's Office Annual Report
186. 2009 Hunterdon County Sheriff's Office Annual report
187. 12/07 DeSapio Notebook given to Trout and Freeholders
188. 1/22/08 Fred Knapp, Esq. letter to DeSapio, Trout and Hunterdon County BCF (shows terms of agreed upon payment)
189. 2/21/08 Yard letter to Trout denying Knapp's legal bills
190. Copies of "blueprints" of Historic Courthouse House emailed to Trout by Frank Bell, Co. Architect
191. 3/20/09 Trout letter to DeSapio, re: Security Guards
192. 3/24/09 Trout letter to DeSapio, re: Security Guards
193. 4/15/08 Mark/Priscilla Bunting email to D. Doolan
 - a. w/ Russo – Falat private email attached
194. 4/15/08 Doolan email to DeSapio and Yard
195. 5/1/08 DeSapio memo to Trout, re: Bunting email request
196. 5/5/08 Trout memo to DeSapio, re: email request
197. 3/17/00 Harcar memo to Doyle – 2000 unclassified salaries w/ numerous attachments (see other side for attachments)
198. 3/30/00 Doyle letter to Freeholder F. Fuzo, unclassified personnel salary
199. 4/25/00 Salary Resolution for unclassified personnel – s/o
200. 4/27/99 Salary Resolution for unclassified personnel – s/o
201. 4/29/98 Salary Resolution for unclassified personnel – s/o
202. 4/22/97 Salary Resolution for unclassified personnel – s/o
203. 5/13/96 Salary Resolution for unclassified personnel – s/o
204. 1/31/00 Supervisor Officers Resolution (salaries)
205. 3/23/99 Hunterdon County BCF Agenda
206. 3/24/99 Doyle letter to Fuzo, staff salaries
207. 3/22/99 Memo to File, Freeholders Mtg. Staff Salary info
208. 3/22/99 DeSapio letter to Doyle, re: Management salary adjustments
209. 3/19/99 Doyle letter to Fuzo, 1999 s/o staff salary schedule
210. 3/11/99 Doyle letter to Yard, unclassified salaries
211. 3/9/99 Yard memo to Doyle, unclassified salaries w/ Sheriff's Office spreadsheet
212. 3/10/99 Doyle letter to Bd. of Free – staff salaries 40A: 117
213. 3/9/99 Doyle letter to Bd. – s/o salary for admin. Personnel (original and 3/10/99 revised)
214. 3/5/99 S/o sergeants contract, pp 42 – article 2 – wages s/o employees pay schedule c
215. 10/29/08 Maloney letter to DeSapio, et al; re: Personnel Records Retention
 - a. S/o administration's job descriptions – Russo, Maloney, Davis Muller
 - b. Trout primary election campaign flyer
 - c. Bruce Cocuzza general election campaign flyers (2)

- d. Constitutional Officers Assoc of NJ 2008 Salary Survey
216. 2/9/10 Maloney letter to Trout, re: Legal Actions
217. 11/5/10 Trout response email to Mennen, re: County ID request
218. 11/8/10 Mennen response to Trout, re: County ID request
219. 9/5/08 George Wagner email to Trout, re: Hunterdon County Sheriff's Office staffing
220. 9/8/08 Maloney response email to George Wagner, re: Hunterdon County Sheriff's Office Staffing
221. 9/11/08 Trout letter to Dir. E. Peterson
222. 2008 Current Fund Appropriations
223. 2008-2010 Sheriff's Office Budge Reports
224. 2007 Primary Campaign flyers for Trout for sheriff
225. 2007 Campaign flyers "Cocuzza for Sheriff"
226. 1/8/08 Trout letter to DeSapio, re: Freeholder meeting 1/9/08
227. 1/9/08 Yard letter to Trout, re: Sheriff's temp. budget
228. 2/13/08 Maloney Certification in support of motion for reconsideration w/ exhibits
229. 3/5/08 Yard letter to Trout, re: Unclassified salaries
230. 4/11/08 Trout letter to Denise Doolan, re: salary request resolution
231. 4/22/08 Trout letter to Dir. E. Peterson, re: salaries
232. 5/9/08 Yard Response to Trout's 4/22/08 letter
233. 4/25/08 Yard memo to Trout, re: 4/22/08 letter to Freeholders
234. 5/13/08 Trout letter to Yard, re: Salaries (w/ attachments)
235. 5/29/09 Trout letter to Farkas, Mennen, Hoffman and Barnes, re: Courthouse hours
236. 6/5/09 Farkas response to 5/29/09 letter
237. 3/08 DeSapio's original "Resolution Concerning Pay for Four Sheriff's Unclassified Employees"
238. 3/08 DeSapio's "Joint Press Release"
239. From 2007 Printout showing amount of Salaries funded by state of NJ Title IV-D reimbursement agreement
240. 2008 Sheriff's proposed temporary budget
241. 8/7/08 certification of sheriff trout (for the matter of the grand jury subpoenas issued 7/29/08) w/ attachments
242. 3/19/09 Yard memo to Trout – new position request
243. 2/29/09 Transcript of Motion of Reconsideration and for stay of decision argument
244. 10/8/10 Trout letter to Director Mennen – salary increases w/ attachments
245. 9/22/10 DeSapio memo to Trout, re: Trout's 8/30/10 letter
246. 8/30/10 Trout's letter to Freeholder Bd. – O & E Budget Interference
247. 10/7/10 Yard memo to Trout – COPS grant purchases
248. 10/13/10 Trout response letter to Yard, re: 10/7/10 memo
249. 5/19/10 DeSapio letter to Darren Gelber, Esq, re: Russo status
250. 5/13/10 DeSapio letter to U/S Russo, re: Notice of Exec. Session on 5/18/10
251. 5/17/10 C. Elston response to 5/13/10 DeSapio letter
252. 4/14/10 Jos. Donahue letter to Judge Ciccone, re: indictments
253. 4/26/10 Jos. Donahue letter to AG Paula Dow, re: investigation of Hunterdon County's Sheriff's Office
254. 5/5/10 McGovern letter to Undersheriff M. Russo, re: grand jury investigation

255. 2/10/10 C. Elston, Esq. letter to AG Paula Dow, re: Hunterdon County Prosecutor's Office
256. 12/8/10 B. Barlyn's notice of tort claim
257. 4/14/10 D. Gelber, Esq. letter to Judge Ciccone, re: Hunterdon County Sheriff's Office/indictments
258. 4/13/10 C. Elston, Esq. letter to Judge Ciccone, re: Hunterdon County Sheriff's Office/indictments
259. 3/11/10 McGovern letter to A. Kenney, Esq. and J. Donahue, Esq, re: State v. Russo and Falat, Jr.
260. 2/22/10 Elston letter to P. Dow and S. Taylor, re: Hunterdon County Prosecutor's Office
261. 3/4/10 Stephen Taylor (Director, AG office) letter to C. Elston
262. 2/24/10 McGovern fax to C. Elston and A. Kenney, re: Russo testimony
263. 2/12/10 DeSapio letter to C. Elston; re: Elston's 2/10 letter to P. Dow
264. 2/2/10 D. Gelber, Esq. letter to Pros. Barnes, re: D. Trout
265. 2/5/10 McGovern letter to Trout, re: Grand Jury Investigation (not target)
266. 3/10/10 McGovern letter to Trout, re: grand jury investigation (target)
267. 2/3/10 C. Elston's letter to Pros. Barnes, re: "leaks to press"
268. 12/22/08 DeSapio email to Trout, re: search warrant/w. cooer
269. 6/8/10 Trout letter to Freeholder Dir. Mennen, re: salaries w/ attachments
270. 10/27/10 DeSapio letter to C. Elston, re: Trout v. Freeholders
271. 10/19/10 DeSapio letter to Trout, re: Trout v. Freeholders
272. 9/2/10 Dir. Mennen's memo to Trout, re: Trout's 8/30/10 letter
273. 9/9/10 Dir. Mennen's memo to Trout, re: Trout's 8/30/10 letter
274. 9/8/10 DeSapio's filing of Defendant's answers - HNT-l-483-10
275. 10/18/10 DeSapio's letter to Judge Ciccone, re: req. for adjournment som-l-1562-10
276. 11/19/10 DeSapio's letter to Trout; re: freeholders "settlement" offer regarding 8/30/10 request
277. 10/24/10 C. Elston letter to DeSapio, re: som-l-1562-10
278. 11/11/10 DeSapio letter to Judge Ciccone, re: Opposition to Motion som-l-1562-10
279. 8/14/08 DeSapio's letter to Judge Mahon, re: grand jury subpoenas issued to Russo and Trout
280. 8/21/08 D. Parichuk letter to Trout, re: Russo
281. 8/27/08 Trout response to Parichuk letter
282. 8/08 Russo letter to Anne Milgram, AG, re: prosecutor's office
283. 12/12/08 Search warrant for Hunterdon County Sheriff's Office signed by Judge R. Mahon
284. 1/8/09 Trout letter to Donna Simon (out with trout)
285. 1/22/09 out with trout.org letter to trout
 - a. Copy of out with trout.org flyer "get the facts"
286. 2/13/09 Gelber letter to Undersheriff John Maloney, re: Attorney - client privilege
287. 2/13/09 Elston letter to Undersheriff John Maloney, re: Attorney - client privilege
288. 2/17/09 Maloney response to Elston and Gelber
289. 12/22/08 DeSapio email to Cheryl Wieder and others, re: search warrants
290. 12/24/08 Maloney email to DeSapio, re: search warrants and DeSapio response to Maloney and others

291. 1/15/10 Undersheriff Maloney letter to Matthew Holt, freeholder
 - a. Hunterdon County Policy #2005-04; conflict of interest and decorum at meetings (amended 10/21/08)
292. 8/7/06 F. Knapp, Esq. letter to Sheriff McGettigan and Sheriff's assoc. regarding "powers and duties of the office of sheriff"
 - a. Emails between DeSapio and Knapp, re: paychecks (3/18/08 – 3/24/08)
293. 8/5/08 Trout letter to W. Forrest, Som. Co. Prosecutor, re: C. Yard certification allegations
294. 8/7/08 Pros. Forrest's response to 8/5/08 Trout letter
 - a. Emails between Undersheriff Maloney and W. Cooper (Hunterdon County Democrat), re: sheriff's officers and road jobs (b/w 7/12/10 – 7/15/10)
295. 6/29/10 National Sheriff's Assoc. Resolution #2010-1
296. 8/24/10 Chief R. Quinlan (Hillside PD) email to Trout
297. 5/11/10 Gelber letter to DeSapio, re: "special emergency mtg."
 - a. Hunterdon County Policy #2005-03 (amended 9/2/08)
 - i. "fringe benefits for constitutional officers, etc."
 - b. Hunterdon County Policy #2003-01 (amended 9/16/08)
 - i. "memberships, trips, meetings, training and conferences."
298. 1/28/08 Melick certification to court on "budget" with attachments, hun-l-45-08
299. 1/29/08 Pros. Barnes letter to Trout
300. 2/13/08 Pros. Barnes letter to Trout
301. 2/15/08 Trout's response letter to Barnes
302. 2/26/08 Trout's letter to Barnes
303. 2/29/08 Barnes letter to Trout
304. 3/3/08 Trout's response to Barnes
 - a. Consent order to preserve documents
 - i. Re: Barlyn v. Dow, et al. (7/25/12)
305. 6/25/12 A. Kenney letter to Christine Hoffman requesting return of property
 - a. Client ledger (A. Kenney for M. Russo) for 2/10 – 11/10
306. 3/11/08 Hunterdon County Sheriff's Office employment application for M. Russo
307. 3/5/08 Hunterdon County employment application for Russo
308. 5/25/10 notice of motion for bail reduction w/ attachment
 - a. certification of Alton D. Kenney
 - b. Order
 - c. Letter to Ms. Calvo
309. 5/28/10 McGovern letter to Judge Armstrong, re: 5/25/10 motion for bail reduction
310. 2/17/10 Kenney letter to McGovern, re: waiver of immunity
311. 9/19/12 notice to produce and inspect documents (Barlyn v. Dow)
312. 12/12/07 Falat email to Russo
313. 2/9/10 Kenney's notes on meeting w/ McGovern and Rowe
314. 2/15/10 Elston letter to McGovern, re: grand jury exhibits
315. 8/7/08 Russo grand jury exhibits list
 - a. Chris Boller notes on Russo's background investigation
316. 7/29/08 Boller subpoena for Russo's invest notes
317. 6/25/12 Kenney letter to DAG Hoffman, re: return of property request
318. 3/11/10 McGovern's pre-indictment offer to Russo and Falat

319. 9/19/12 Jane Greenfogel, DAG, letter to Courtney, re: Barlyn v. Dow and Falat, et al., v. Hunterdon, et al. (preserving documents)
320. 3/4/08 emails between Russo and "moderator" of forums, re: Slander on's posts
321. 5/19/10 DeSapio letter to Gelber, re: status of Undersheriff Russo
322. 5/25/10 Gelber response letter to DeSapio, re: Sheriff Trout and Russo status
323. 2/18/10 Gelber letter to AG Dow, re: Supersession
324. 5/7/10 Elston letter to Acting Prosecutor Dermott O'Grady
325. 4/14/10 Gelber letter to Judge Ciccone, re: indictments and/or presentment kept under seal
326. 7/30/08 Barnes letter to Trout, re: State v. Falat
327. 2/5/10 McGovern letter to Russo, re: G.J. Invest
328. 2/8/10 McGovern letter to Falat, re: G.J. Invest
 - a. 3 letters from Gelber to Ms. Webb-Robbins (FOP Legal Plan) dated 7/10/09, 3/30/10 and 10/26/10, re: Status of "Sheriff Deborah Trout" case
329. 8/29/11 Prosecutor's Office (Michelle Verish) letter to Donahue with check for \$550.00 – (return to Falat)
330. 3/11/10 McGovern letter to Counsel (Donahue and Kenney), re: Russo and Falat plea offers
331. Documents that are in the possession of the Attorney General's Office that were previously in the possession of the Plaintiff's that were removed by the Hunterdon County Prosecutor's Office on December 22, 2008 are all relevant

(C) Computation of Damages:

Plaintiffs will be seeking compensatory damages, included but not limited to damages for lost wages, lost benefits, lost pension, emotional distress, loss of reputation, hedonic damages and nominal, exemplary and punitive damages as well as attorney's fees, interests and cost of suit. Plaintiffs have yet to determine the exact amount of the aforesaid damages but they believe them to be in excess of \$5 million. Plaintiffs will provide a computation of damages as discovery continues and Plaintiffs reserve the right to retain experts to testify to the existence of said damages.

(D) Insurance Agreements:

Not Applicable

CERTIFICATE OF SERVICE

On this date, I served a true copy of the attached **RULE 26 DISCLOSURES** on each of the parties listed below by First Class U.S. Mail to W. Timothy Howes, Esq. and regular mail and email sent to their attorneys of record at their last known addresses as follows:

W. Timothy Howes, Esq.
Howes & Howes
26 Anderson Street
Raritan, New Jersey 08869
Attorneys for Defendant Donna Simon

Howard B. Mankoff, Esq.
Marshall Dennehey Warner Coleman & Goggin
425 Eagle Rock Avenue, Suite 302
Roseland, New Jersey 07068
Attorneys for Defendant Gaetano DeSapio

Eric L. Harrison, Esq.
Methfessel & Werbel
3 Ethel Road, Suite 300
P.O. Box 3012
Edison, New Jersey 08818
Attorneys for Defendants Kenneth Rowe and Edward DeFilippis

**LAW OFFICES OF
WILLIAM J. COURTNEY, L.L.C.**
Attorneys for Plaintiff

Dated:

By: 

William J. Courtney, Esq.

EXHIBIT "B"



CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

State of New Jersey
OFFICE OF THE ATTORNEY GENERAL
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF LAW
25 MARKET STREET
PO Box 112
TRENTON, NJ 08625-0112

JOHN J. HOFFMAN
Acting Attorney General

JEFFREY S. JACOBSON
Director

Jane.greenfogel@dol.lp.state.nj.us

April 28, 2014

VIA Hand Delivery

Joseph H. Orlando, Clerk
Attn: Kathy Kuhn, Case Manager
Appellate Division Clerk's Office
Richard J. Hughes Justice Complex
25 Market Street, P.O. Box 006
Trenton, New Jersey 08625

RECEIVED
APPELLATE DIVISION

APR 28 2014

SUPERIOR COURT
OF NEW JERSEY

Re: Bennett Barlyn v. Paula Dow, et al.
App. Div. Docket No. AM-37-13T4

Your Honors,

This office represents defendants, Paula T. Dow, Stephen J. Taylor, Dermot O'Grady, State of New Jersey, Office of the Attorney General, and the New Jersey Division of Criminal Justice in the above-captioned matter. After extensive briefing by both sides, an Interlocutory Appeal was argued before Your Honors on January 28, 2014 regarding the release of grand jury transcripts and documents (grand jury materials) relating to the indictment of former Hunterdon County Sheriff Debra Trout, Undersheriff Michael Russo and Investigator John Falat, Jr.



April 28, 2014

Page 2

In his April 24, 2014 letter to this Court, counsel for Bennett Barlyn argued that certain discovery requests in the matter of John Falat, et al. v. The County of Hunterdon, et al., Civil Action No. 2:12-cv-06840 directly relate to the pending appeal before Your Honors. This is certainly not the case.

Although both the plaintiffs and the defendants in the Falat matter seek discovery relating to the grand jury materials, those requests have no relevance whatsoever to this Court's ultimate decision in the Barlyn appeal. It is inconceivable that counsel for Barlyn claims in his April 24, 2014 letter that the Barlyn defendants are somehow admitting that the grand jury materials are of "central importance in both matters."

Quite the contrary. Our April 22, 2014 letter to the Falat defendants merely confirms an agreement made between the State and the County of Hunterdon that the return date of my clients' response to the County's subpoenas, which could be in the form of a Motion to Quash, is postponed pending the decision of this Court. (See Exhibit C attached to Lytle's letter of April 24, 2014).

It is respectfully submitted that the Court not consider the late submission of Barlyn's counsel in further support of his opposition to the pending Interlocutory Appeal. As a former

April 28, 2014

Page 3

defendant in the Falat federal lawsuit, Barlyn was not only aware of the discovery requests for the grand jury materials issued in that matter, but addressed that point during the January 28, 2014 oral argument of the Interlocutory Appeal. It is respectfully submitted that there is absolutely nothing new contained in counsel's April 24, 2014 letter to the Court that should be considered by Your Honors.

Thank you for your consideration.

Respectfully submitted,

JOHN J. HOFFMAN
ACTING ATTORNEY GENERAL OF NEW JERSEY

By: 

Jane A. Greenfogel
Deputy Attorney General

JAG/lmt
Encls.

cc: Robert E. Lytle, Esquire (via facsimile/email)

Via Facsimile:

Nicholas P. Milewski, Esq.
William J. Courtney, Esq.
Eric L. Harrison, Esq.
Howard B. Mankoff, Esq.
W. Timothy Howes, Esq.

EXHIBIT "C"

**LAW OFFICES OF
WILLIAM J. COURTNEY, L.L.C.**
200 Main Street
P.O. Box 112
Flemington, New Jersey 08822
(908) 782-5900 (tel)
(908) 782-7001 (fax)
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

JOHN FALAT, JR.; MICHAEL RUSSO AND
DEBORAH TROUT

Plaintiffs,

V.

THE COUNTY OF HUNTERDON, et al.

Defendants.

Civil Action No. 2:12-cv-06804-SRC-CLW

Civil Action

**PLAINTIFF'S DOCUMENT DEMANDS
TO BE ANSWERED BY DEFENDANT
KENNETH ROWE**

**TO: Eric L. Harrison, Esq.
Methfessel & Werbel
3 Ethel Road, Suite 300
P.O. Box 3012
Edison, New Jersey 08818**

PLEASE TAKE NOTICE that the undersigned, Law Offices of William J. Courtney, L.L.C., attorneys for Plaintiffs, John Falat, Jr., Michael Russo, and Deborah Trout, request that defendant Kenneth Rowe answer the Document Demands within the time prescribed by the Rules governing the Courts of the State of New Jersey.

**LAW OFFICES OF
WILLIAM J. COURTNEY, L.L.C.**
Attorneys for Plaintiffs

By. 

William J. Courtney, Esq.

Dated: October 10, 2013

INSTRUCTIONS

1. Notice is hereby given that these Requests for Production of Documents shall be deemed as continuing so as to require supplemental answers if further information is obtained in between the time that answers to these requests are filed and the time of trial.
2. The documents provided in response to these Requests must include all documents available to Defendant(s), including documents in the possession or control of the Defendant(s) agents and employees, including attorneys, investigators and all persons acting on their behalf or under their control.
3. With respect to any document or portion thereof which have been lost, destroyed, discarded or otherwise disposed of since their preparation or receipt, provide the following information separately as to each document:
 - a. General description of subject matter;
 - b. Author, recipient(s) and date of document;
 - c. Name of last custodian of document or copies thereof;
 - d. A full accounting of how the document came to be lost, disposed of or otherwise was obtained; and
 - e. A description sufficient to form the basis for a request for production of any other document containing same, all or similar information to the otherwise unobtainable document.
4. If you do not provide a requested document, in whole or in part, because of a claim of privilege or work product:
 - a. Set forth the privilege claimed;
 - b. Identify the facts upon which you rely to support the claim of privilege and identify all documents for which such privilege is claimed. In particular, if you refuse to produce a document because of a claim of the attorney-client privilege, identify the author or speaker of the communication, the capacity in which the speaker or author was acting when he made the communication and the recipient of the communication.

DEFINITIONS

As used in this Notice to Produce:

1. "Address" means the present or last known street name and number, city or town, state and zip code.

2. "You", "your", or "Defendant(s)" means Kenneth Rowe, and/or their agents, servants, employees representatives, private investigators, or others who are in possession of or who may have obtained information for or on behalf of any Defendant(s), or who may have been acting or purporting to act on behalf of any Defendant(s).

3. "Representatives" means any present or former director, officer, partner, agent, counsel, accountant, employee, independent contractor, or other person acting on behalf of a corporation, association, business, entity or another person.

4. "Person" means any individual, corporation, professional corporation, firm, partnership, proprietorship, association, business, or other entity.

5. "Document" means any manner of letter, memorandum, note, logbook, notebook, contract, agreement, working papers, audit paper, spread sheet, study, reports, record, notice, deposition, minutes of meetings of board of directors or of shareholders of a corporation, program computation, multi-column accounting sheet, work pad, diary, legal opinion, message, telegram, brochure, computer printout, invoice, billing, graph, projection, financial statement, balance sheet journal entry, book entry, confirmation, advice, or other items, whether in manuscript, typewritten, printed, electronic, magnetic, or other form or recording of any kind, and whether in original or copy form.

6. "Communication" means any manner or means of disclosure, transfer, or exchange, and any disclosure, transfer or exchange of information whether orally or by document, or whether face-to-face, by telephone, mail or personal delivery.

7. "Meeting" means any assembly, convocation, encounter or coincidence of two or more persons for any purpose, whether or not planned, arranged, or scheduled in advance.

8. As used herein, the words "identify", "identity", or "identification", when used in reference to:

- a) A natural person— means to state his or her full name and present and last known address, present and last known address, present and last known position, or business affiliation and its address;
- b) A document— means to state the following information with respect to each such document:
 - i) The date appearing on such document; and if no date appears thereon, the answer shall so state and give the date or approximate date such document was prepared;

- ii) The general nature, description or type of document (i.e., whether it is a letter, memoranda, sound recording, drawing, etc.) and the number of pages of which it consists;
- iii) The author(s) or name(s) of the person who signed such document, if it was not signed, the answer shall so state and give the name(s) or the person(s) who prepared it;
- iv) The name(s) of the person(s) to whom such document was addressed and the name(s) of each such person(s) other than such addressee(s) to whom such document or copies thereof was given or sent;
- v) The general subject matter of such document;
- vi) The name(s) of the person(s) having custody, possession or control of such document and its present location;
- vii) If any document was, but is no longer in your possession, or subject to your control or in existence, state whether it is accessible, missing or lost, has been destroyed, has been transferred voluntarily or involuntarily to others, or has been otherwise disposed of and, in each instance, explain the circumstances surrounding such disposition thereof, the date thereof, the contents of said document;
- c) An oral communication— means to state the following information with respect to each such oral communication:
 - i) The date and place where it occurred;
 - ii) The identity of each person to whom such communication was made, each person by whom such communication was made, each person who was present when such communication was made; and
 - iii) The subject matter of such communications.
- d) A business organization— means to state its name, its address, the name and address of each of its agents that acted for it with respect to the matters that are relevant to the Interrogatory involved, and its relationship, if any, with Plaintiffs.
- e) A meeting— means, with respect to such meetings:
 - i) State the date hereof;
 - ii) State where it was held;
 - iii) Identify each individual who attended or participated in such meeting;
 - iv) State on behalf of what individual or organization each such individual was purporting to act; and
 - v) Identify each document which records or describes such meeting.

The singular includes the plural, and vice-versa. The masculine includes the feminine and neuter genders. The past tense includes the present tense where the clear meaning is not distorted by a change of tense.

DOCUMENT REQUESTS

1. Copies of all communications between any member of the Hunterdon County Prosecutor's Office and any member of the Hunterdon County Sheriff's Office, excluding the Plaintiffs, pertaining to the Grand Jury investigations of the Plaintiffs.
2. Copy of notes and/or reports of any investigation by any member of the Hunterdon County Prosecutor's Office pertaining to Hunterdon County Sheriff's Office appointee John Maloney.
3. All correspondence, including but not limited to Affidavits in Support of Obtaining Search Warrants for Plaintiffs', Sheriff's Offices and Falat's residence and vehicles. Include correspondence for any other search warrants regarding Plaintiffs that may have been denied by the Judge.
4. Copy of July 29th, 2008 Subpoenas to Plaintiffs Trout and Russo.
5. Copies of all Grand Jury exhibits for each of the Plaintiffs.
6. Copies of all Grand Jury transcripts pertaining to the Plaintiffs' indictments.
7. Copies of all communications between any member of the Hunterdon County Prosecutor's Office and Antoine Rought from 2007 through 2009 regarding the Plaintiffs.
8. Copies of all communications between any member of the Hunterdon County Prosecutor's Office and Dale Panichuk from 2007 to present regarding the Plaintiffs.
9. Copies of all communications between any member of the Hunterdon County Prosecutor's Office and any member past or present, of the New Jersey State Police from 2007 to present regarding the Plaintiffs.

10. Copies of all communications between any member of the Hunterdon County Prosecutor's Office and Carol Zelinack from 2007 to present regarding the Plaintiffs.
11. Copies of all communications between any member of the Hunterdon County Prosecutor's Office and David Gallant from 2009 to present regarding Plaintiff Russo.
12. Copies of all communications between any member of the Hunterdon County Prosecutor's Office and Mark Kobner from 2007 to Present regarding the Plaintiffs.
13. Copies of all investigative notes and/or reports from all members of the Hunterdon County Prosecutor's Office that participated in the Grand Jury investigation regarding the Plaintiffs.
14. The reasons for obtaining the July 29th, 2008 subpoenas served on both Plaintiffs Trout and Russo.
15. Copy of any correspondence by the Hunterdon County Prosecutor's Office requesting similar information as in the January 29th, 2008 letter to any other office or Law Enforcement Agencies in Hunterdon County.
16. Copy of all Hunterdon County Prosecutor's law enforcement practice guidelines or policies referenced in Prosecutor Barnes January 29th, 2008 letter to Sheriff Trout.
17. Any and all correspondence between any Defendants regarding Plaintiff's indictments and/or the five resolutions passed in May 2010.
18. All communications from Defendants DeSapio, Yard, and Freeholder board members to any member of the Hunterdon County Prosecutor's Office relating to the letters of January 29th, 2008 and February 13th, 2008 sent to Sheriff Trout from Hunterdon

County Prosecutor Barnes referencing her comporting to sound law enforcement practice, guidelines, etc. and requesting personnel files, background investigation, etc.

19. All correspondence including but not limited to emails, freeholder minutes and executive session meeting minutes between Defendant DeSapio and any other party regarding Plaintiff Trout not swearing in any new hires.
20. Copies of any communications regarding the July 31st, 2008 Michael Russo Grand Jury Subpoena.
21. Copies of all communications between you and the Hunterdon County Prosecutor's Office between 2007 and 2010 concerning the Plaintiffs and/or the Sheriff's Office.

EXHIBIT "D"

THOMAS B. HANRAHAN & ASSOCIATES, LLC

**Counsellors at Law
80 Grand Avenue, Suite #2
River Edge, New Jersey 07661-1914
(201) 525-1011/Telecopier (201) 525-1876**

Thomas B. Hanrahan

David J. Pack +
Nicholas P. Milewski
Kathy A. Kennedy

+Also Admitted in New York

May 2, 2014

VIA EMAIL AND REGULAR MAIL

William J. Courtney, Esq.
William J. Courtney, LLC
200 Main Street
PO Box 112
Flemington, New Jersey 08822
Attorney for Plaintiffs

Eric L. Harrison, Esq.
Methfessel & Werbel
2025 Lincoln Highway, Suite 200
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Attorney for Defendants Kenneth Rowe and Edward DeFillipis

Howard B. Mankoff, Esq.
Marshall Dennehey Warner Coleman & Goggin
425 Eagle Rock Avenue, Suite 302
Roseland, New Jersey 07068
Attorney for Defendant Gaetano DeSapio

W. Timothy Howes, Esq.
Howes & Howes
26 Anderson Street
Raritan, New Jersey 08869
Attorney for Defendant Donna Simon

**RE: Falat v. The County of Hunterdon, et al.
Civil Action No.: 2:12-cv-06804 (FSH/MAH)
Our File No. 1-226**

Dear Counsel:

As you are aware, this office represents Defendants the County of Hunterdon, George Melick, William Mennen, Ronald Sworen, Matthew Holt, Erik Peterson, Robert Walton, and Cynthia Yard in the above-captioned matter. Pursuant to F.R.C.P. 45(a)(4) I enclose herewith a

copy of a subpoena which I intend to serve upon the Hunterdon County Prosecutor's Office within the next two (2) days.

Very truly yours,

A handwritten signature in black ink, appearing to read "N. Milewski", written in a cursive style.

NICHOLAS P. MILEWSKI

NPM/jad
Enclosure

THOMAS B. HANRAHAN & ASSOCIATES, LLC

**Counsellors at Law
80 Grand Avenue, Suite #2
River Edge, New Jersey 07661-1914
(201) 525-1011/Telecopier (201) 525-1876**

Thomas B. Hanrahan

David J. Pack +
Nicholas P. Milewski
Kathy A. Kennedy

+Also Admitted in New York

April 14, 2014

VIA EMAIL AND REGULAR MAIL

William. J. Courtney, Esq.
William J. Courtney, LLC
200 Main Street
PO Box 112
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Attorney for Plaintiffs

Eric L. Harrison, Esq.
Methfessel & Werbel
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Attorney for Defendants Kenneth Rowe and Edward DeFillipis

Howard B. Mankoff, Esq.
Marshall Dennehey Warner Coleman & Goggin
425 Eagle Rock Avenue, Suite 302
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Attorney for Defendant Gaetano DeSapio

W. Timothy Howes, Esq.
Howes & Howes
26 Anderson Street
Raritan, New Jersey 08869
Attorney for Defendant Donna Simon

**RE: Falat v. The County of Hunterdon, et al.
Civil Action No.: 2:12-cv-06804 (SRC-CLW)
Our File No. 1-226**

Dear Counsel:

As you are aware, this office represents Defendants the County of Hunterdon, George Melick, William Mennen, Ronald Sworen, Matthew Holt, Erik Peterson, Robert Walton, and Cynthia Yard in the above-captioned matter. Pursuant to F.R.C.P. 45(a)(4) I enclose herewith a

copy of a subpoena which I intend to serve upon the New Jersey Department of Law and Public Safety and upon the New Jersey Division of Criminal Justice within the next two (2) days.

Very truly yours,

A handwritten signature in black ink, appearing to read "N. Milewski".

NICHOLAS P. MILEWSKI

NPM/jad
Enclosure